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June 29, 1999

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 Twelfth Street, SW Room TWB-204  
Washington, DC 20554

RECEIVED  
JUN 29 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex parte - CC Docket No. 96-98  
In the Matter of the Local Competition  
Provisions in the Telecommunications Act of 1996

Dear Ms. Salas:

Today, a copy of the enclosed letter was sent to Carol Matthey and Jake Jennings of the Common Carrier Bureau.

Two copies of this Notice are being submitted to the Secretary of the Commission in accordance with Section 1.1206(b)(1) of the Commission's Rules.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Albert M. Lewis".

Enclosure

cc: Ms. Carol Matthey  
Mr. Jake Jennings  
Mr. Frank Simone, AT&T

No. of Copies rec'd 042  
List A B C D E



Rian J. Wren  
Regional President - Southwest States  
Local Services Organization

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June 28, 1999

Ms. Sandy Kinney  
President - Industry Markets  
SBC Telecommunications, Inc.  
One Bell Plaza, Suite 5705  
Dallas, TX 75202

Subject: AT&T UNE Market Entry Concerns

Dear Sandy:

As I am sure you are already aware, 27 out of 28 AT&T customers lost outbound dialing capabilities within the last 10 days upon SWBT's completion of its service order processing activities necessary to convert AT&T customers from Resale to UNE. This is the problem that I called about last Wednesday and described to you via voice mail. Six days after reporting her trouble, we have a customer that is still not able to place outbound calls. In general, it seemed to take between 2 and 4 days to restore service after reporting such via the repair and maintenance process. In light of the customer-affecting problems that have been identified through AT&T's Service Readiness Testing (SRT) and AT&T's initial conversion of a limited number of customers from Resale to UNE, I am very concerned that SWBT's Operational Support Systems (OSSs) do not have the level of electronic processing capabilities necessary to support commercial volumes.

Sandy, as I shared with you during our January 26, 1999, and March 23, 1999, meetings, it was AT&T's intent to convert its embedded base of approximately 64K customers from Resale to UNE in the July/August timeframe with order volumes on the magnitude of 4K per day. As we discussed, AT&T would assess the results of the conversion process to determine how quickly AT&T could ramp its commercial entry volumes. At this time, we are very concerned that SWBT's systems and processes are not capable of supporting the volumes we previously discussed. As a result, I am requesting a detailed description and audit of SWBT's end-to-end process in order to further evaluate capabilities and next steps. Where manual processes are performed, we would like to understand SWBT's mechanization plans. Although we understand that manual processes will negatively impact performance measurement results, we

are more concerned with providing quality customer service than receiving financial benefits due to poor performance.

We were surprised to learn on Friday for the first time that SWBT implemented a manual process to relate the SWBT generated "D" and "N" orders for purposes of migrating customers to UNE. We are very troubled by the fact that these manual processes apparently worked during the TX PUC OSS test but failed during our testing and conversion efforts.

Moreover, not only did the manual processes to install service fail, the trouble ticketing process also failed in that it did not result in root cause identification and resolution. AT&T received responses to trouble tickets ranging from "no trouble found" to "bad pairs". We had to refer this issue to the account team in order to receive the attention necessary to research and resolve the problems experienced by AT&T's customers. Additionally, once a dispatch was requested by AT&T's work center, SWBT's technicians began contacting AT&T's customers directly as opposed to working the customer contact through AT&T.

As we understand the issue based on our discussions with the account team, the manual process implemented by SWBT will impact **all UNE migration orders**, e.g., SWBT existing retail to CLEC orders, CLEC to CLEC orders, etc., and it is not scheduled to be replaced with an electronic process until "mid-August". This has put AT&T's Resale embedded base conversion and market entry plan in jeopardy. We are disappointed that this was never described to AT&T and/or other industry participants by SWBT despite the numerous flow through discussions that have taken place.

On a related note, the lack of electronic flow through to SWBT's back office systems is causing a tremendous problem in the area of repair and maintenance in general. Upon completion of an AT&T customer LSR, AT&T cannot access its customers via toolbar to perform MLT and/or to issue trouble tickets upon receipt of customer trouble reports. We have found that it is taking more than 3, 10, 20 and even 50 days before SWBT's systems are updated. It is essential that customer information be available on completion of customer service provisioning as it is the time when service performance is most vulnerable.

Please let me know by end of business Thursday, July 1, 1999, as to when we can perform a detailed audit and analysis of the end-to-end process as well as discuss improvement plans. We will use this information to re-evaluate AT&T's conversion and market entry plans.

Sincerely,

A handwritten signature in black ink, appearing to read "Rian J. Wren", written over a horizontal line.

Rian J. Wren